

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

ROBERT DAVID STEELE )

et al )

Plaintiffs, )

v. )

Case 3:17-cv-601-MHL

JASON GOODMAN )

et al )

Defendants. )

## **TABLE OF CONTENTS**

On July 15, 2020, Plaintiffs submitted to the Court two (2) copies of all evidence requested and all evidence disclosed by Plaintiffs. The documents were bates-stamped. The following Table identifies the specific documents produced by specific subject matter, date, mode of transmission, and bates-number:

<b><i>Evidence Requested/Disclosed</i></b>	<b><i>Date</i></b>	<b><i>Mode of Transmission</i></b>	<b><i>Bates Number</i></b>
Plaintiff's First Request for Production of Documents	05/15/2019	Email	PX 1-19
Goodman Receipt	05/15/2019	Email	PX 20
Goodman Response to Plaintiff's First Request for Production of Documents and Motion to Stay Discovery	05/29/2019	CM/ECF	PX 21-55
Plaintiff's Rule 26(a)(1) Disclosures	06/14/2019	Email	PX 56-68

<b><i>Evidence Requested/Disclosed</i></b>	<b><i>Date</i></b>	<b><i>Mode of Transmission</i></b>	<b><i>Bates Number</i></b>
Goodman Receipt	06/14/2019	Email	PX 69
Goodman Initial Disclosure Statement	06/17/2019	CM/ECF	PX 70-82
Plaintiffs' request for Rule 26(a)(1) disclosures and documents and Request for telephonic Conference	06/17/2019	Email	PX 83-88
Communications with Goodman regarding discovery	07/30/2019	Text messages	PX 89
Communication from Goodman regarding discovery and other matters	07/31/2019	Email	PX 90
Plaintiff's First Request for Admissions and First Interrogatories	08/01/2019	Email	PX 91-156
Communications with Goodman regarding discovery disputes	08/03/2019	Email	PX 157-180
Communications with Goodman regarding discovery disputes	08/05/2019	Email	PX 181-182
Plaintiff EIN's First Interrogatories	08/06/2019	Email	PX 183-190
Goodman Receipt	08/06/2019	Email	PX 191
Summary of discovery conference and other matters	08/16/2019	Email	PX 192-198
Communications with Goodman regarding discovery disputes	08/19/2019	Email	PX 199
Goodman responses/objections to Plaintiff's first request for production of documents	08/19/2019	Email	PX 200-247

<i><b>Evidence Requested/Disclosed</b></i>	<i><b>Date</b></i>	<i><b>Mode of Transmission</b></i>	<i><b>Bates Number</b></i>
Goodman's first request for admissions to Plaintiffs	08/23/2019	Email	PX 248
Goodman's response to Defendant Negron's request for admissions	08/23/2019	Email	PX 249-255
Plaintiffs' answers and responses To Negron's discovery requests	09/22/2019	Email	PX 256-308
Goodman Receipt	09/22/2019	Email	PX 309
Plaintiffs' responses to Goodman's request for admissions	09/23/2019	Email	PX 310-330
Goodman Receipt	09/23/2019	Email	PX 331
Plaintiffs' Expert Witness 26(a)(2) Disclosure	11/19/2019	Email	PX 332-337
Goodman Receipt	11/19/2019	Email	PX 338
Communication with Goodman regarding HighTail email and other matters <sup>1</sup>	12/09/2019	Email	PX 339
Defendant Negron's First Interrogatories and First Request for Production of Documents	12/09/2019	Email	PX 340
Emails regarding production of Plaintiffs' Documents	01/09/2020	HighTail	PX 341-347
Communications regarding Inadvertent production of privileged documents	01/13/2020	Email	PX 348

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<sup>1</sup> Unfortunately, telephone calls and email communications with Mr. Goodman were consistently punctuated with insults and ugly personal attacks. A few examples are attached. There are many more. Although every attempt was made in good faith to resolve discovery disputes, none could be resolved.

<b><i>Evidence Requested/Disclosed</i></b>	<b><i>Date</i></b>	<b><i>Mode of Transmission</i></b>	<b><i>Bates Number</i></b>
Plaintiffs' Motion in Limine and Memorandum in Support <sup>2</sup>	01/17/2020	Email	PX 349
Goodman Receipt	01/17/2020	Email	PX 350
Goodman Amended Disclosure Statement	01/21/2020	CM/ECF	PX 351-361
Communications regarding setting hearing, use of HighTail and production of Plaintiffs' documents on a flashdrive	01/23/2010	Email	PX 362-364
Communications regarding Production of Plaintiffs' documents on a flash drive	01/24/2020	Email	PX 365
Communications regarding Preparation of Final Pretrial Order	03/07/2020	Email	PX 366-368
Communications from Goodman regarding preparation of the Final Pretrial Order	03/08/2020	Email	PX 369-371
Communications from Goodman regarding filing of the Final Pretrial Order	03/11/2020	Email	PX 372
Joint (Proposed) Final Pretrial Order	03/12/2020	Email	PX 373

<sup>2</sup> Communications with Mr. Goodman were extremely difficult. Agreements to narrow discovery and produce documents reached on the telephone were not kept. Mr. Goodman did not produce a privilege log. He did not file a motion pursuant to express instructions in the Court's Initial Pretrial Order. The discussions seemed to go nowhere. Plaintiffs' counsel concluded that any further discussion with Mr. Goodman was completely futile. Instead of filing a second motion to compel, and in light of Mr. Goodman's failure (a) to produce his Rule 26(a)(1) documents, (b) to produce documents responsive to Plaintiffs' discovery requests, (c) to answer to 2 sets of interrogatories, and (d) to answer and respond to Negron's interrogatories and request for production of documents, Plaintiffs' counsel decided to file a motion *in limine* to preclude Goodman from introducing evidence he failed to produce in discovery.

<b><i>Evidence Requested/Disclosed</i></b>	<b><i>Date</i></b>	<b><i>Mode of Transmission</i></b>	<b><i>Bates Number</i></b>
Plaintiffs' Witness and Exhibit Lists and Trial Exhibits	03/30/2020	Email	PX 374, 376
Goodman Receipt	03/30/2020	Email	PX 375
Proposed Stipulations of Uncontroverted Facts	03/31/2020	Email	PX 378
Goodman Receipt	03/31/2020	Email	PX 379
Communications from Goodman containing ongoing insults	03/31/2020	Email	PX 380-385
Plaintiffs' Discovery Designations	07/01/2020	Email	PX 386
Communications with Goodman regarding stipulations and other matters	07/03/2020	Email	PX 387-392
Proposed Stipulations of Uncontroverted Facts	07/09/2020	Email	PX 393
Goodman Receipt	07/09/2020	Email	PX 394
Transfer of Plaintiffs' Documents per agreement with Goodman	07/09/2020	WeTransfer	PX 395-396, 403
Transfer of Plaintiffs' Trial Exhibits agreement with Goodman	07/09/2020	WeTransfer	PX 397-400
Transfer of Plaintiffs' Discovery Designations per agreement with Goodman	07/09/2020	WeTransfer	PX 401-402
Goodman Receipt	07/09/2020	Email	PX 404
Communications with Goodman regarding working together	07/11/2020	Email	PX 405-415

Plaintiffs and Goodman are in active discussions to reach an agreement regarding all matters and concerns raised by the Court in its memorandum opinion.

On July 16, 2020, Mr. Goodman produced an electronic copy of the documents he produced to the Court at the July 15, 2020 hearing. Mr. Goodman indicated in his email that these documents are his “Rule 26a documents”.